

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

PATRICIA COSGROVE,

Plaintiff,

v.

NEW SEABURY RESOURCES
MANAGEMENT, INC.,

Defendant.

**Civil Action No.
1:05-cv-10791-GAO**

**PLAINTIFF'S ASSENTED-TO MOTION FOR AN EXTENSION OF TIME TO
FILE OPPOSITIONS TO SUMMARY JUDGMENT MOTIONS**

Plaintiff and Defendant filed cross-motions for summary judgment in this action on June 9 and June 12, 2006. The parties' oppositions to these summary judgment motions are currently due on Friday, June 30, 2006. Plaintiff requests a two-week extension of the deadline to file summary judgment oppositions on the following grounds:

1. Plaintiff's counsel has been working diligently to meet the June 30 deadline for summary judgment oppositions. However, earlier this week, Plaintiff's counsel came down with a bad cold that has slowed progress in completing the briefing. Plaintiff's counsel's illness is compounded by the fact that she is eight months' pregnant.

2. This case involves numerous claims under Title VII and the Family and Medical Leave Act concerning three separate employment actions, and allowing the parties additional time to brief the issues will help elucidate the

issues and facilitate more expeditious resolution of the parties' summary judgment motions.

3. Plaintiff's counsel has spoken with Defendant's counsel about this motion, and he has stated that Defendant assents to the motion.

For the foregoing reasons, Plaintiff requests that the parties be granted an additional two weeks to file their summary judgment oppositions, until Friday, July 14, 2006.

Respectfully submitted,

PATRICIA COSGROVE,
By her attorneys,

s/ Hillary Schwab

Shannon Liss-Riordan, BBO #640716
Hillary Schwab, admitted *pro hac vice*
PYLE, ROME, LICHTEN, EHRENBERG
& LISS-RIORDAN, P.C.
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Dated: June 28, 2006

CERTIFICATE OF SERVICE

I hereby certify that on June 28, 2006, I caused a copy of this document to be served by electronic filing on Howard I. Wilgoren, 6 Beacon Street, Suite 700, Boston, MA 02108, counsel for the defendant.

s/Hillary Schwab

Hillary Schwab, Esq.